

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WANJUAN MEDIA (TIANJIN) CO., LTD. a.k.a.  
PILOT FILM AND TELEVISION MEDIA  
(TIANJIN) CO., LTD.,

Plaintiff,

v.

AMAZON.COM, INC., AMAZON.COM  
SERVICES LLC, and “JOHN DOES” 1-5,

Defendants.

Case No.: 1:22-cv-1434-JPO

**NOTICE OF CROSS MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the attached Rule 56.1 Statement of Material Facts, the attached Declarations of Kevin K. Tung and Jian Ling Zhao with attached exhibits, and the accompanying Memorandum of Law in Support of Plaintiff's Cross-Motion for Summary Judgment, along with all pleadings and proceedings in this matter, Plaintiff Wanjuan Media (Tianjin) Co., Ltd. a.k.a Pilot Film and Television Media (Tianjin) Co., Ltd. (“Plaintiff” or “Wanjuan Media”) will move this Court before the Honorable J. Paul Oetken, at the United States District Court, 40 Foley Square, New York, New York 10007, for an Order: (i) granting summary judgment for Plaintiff under Fed. R. Civ. P. 56 on the grounds that there are no genuine issue of material facts and Plaintiff is entitled to judgment as a matter of law; and (ii) awarding Plaintiff its costs, including attorneys' fees and such other and further relief as the Court may deem just and proper.

Dated: Queens, New York  
April 21, 2023

Respectfully submitted,

**KEVIN KERVENG TUNG, P.C.**  
*Attorneys for Plaintiff*

/s/ Kevin K. Tung

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